

EXHIBIT 2

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

ABRIELLE LONDO,

Plaintiff,

v.

Case No. 2:20-cv-53
Hon. Paul. L. Maloney

ENRIGHT FAMILY RESTAURANTS,
et al.,

Defendants.

PLAINTIFF'S RESPONSES TO DEFENDANT'S REQUESTS TO PRODUCE

Now Comes Plaintiff, Abrielle Londo, by and through her attorney, Hanshaw Burink, PLC and hereby provides the following responses to Defendants First Document Requests:

1. Please produce all documents in your possession referring or relating to Steven Whelan in any way.

Answer:

Please see attached.

2. Please produce all documents in your possession referring or relating to Enright Family Restaurants, Inc. in any way.

Answer:

Please see attached.

3. Please produce all curriculum vitae for all expert witnesses you intend to call at the time of trial.

Answer:

Plaintiff has no such documents in her care, custody or control. If Plaintiff retains an expert, she will supplement this response.

4. Please produce any and all photographs relating to the allegations in Plaintiff's Complaint.

Answer:

Plaintiff has no such documents in her care, custody or control.

5. Please produce any and all mobile phone/smart phone screenshots, including but not limited to screen shots of text messages, relating in any way to the allegations in Plaintiff's Complaint or Defendants' defenses.

Answer:

Please see attached.

6. Please produce any and all photographs or video recordings you may introduce at the time of trial.

Answer:

Please see attached.

7. Please produce any and all written correspondence, emails, and text messages relating to the allegations in Plaintiff's Complaint.

Answer:

Please see attached.

8. Please produce any and all written correspondence, emails, and text messages sent to Defendant for any reason.

Answer:

Please see attached.

9. Please produce a legible copy of any and all Documents upon which you intend to rely at any hearing in this case or at the trial.

Answer:

Plaintiff does not know each and every document she will use to support her claims in this matter. However, Plaintiff may use the attached documents, any documents produced by Defendants and any documents that have yet to be produced by Defendants but that are forthcoming.

10. Please execute and return the attached authorizations for the release of health, employment and other information.

Answer:

No authorizations were included with Defendant's request.

11. Provide a copy of all documentation referenced in Plaintiff's Initial Disclosures.

Answer:

Please see attached.

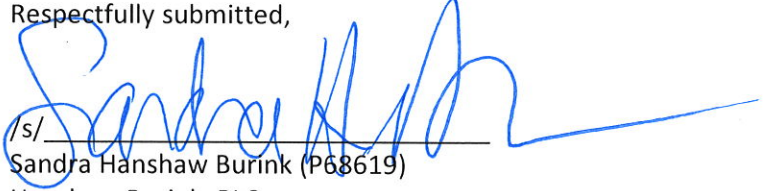
12. Provide a copy of any other documentation, in any format, that Plaintiff intends to use in support of her claims.

Answer:

Plaintiff does not know each and every document she will use to support her claims in this matter. However, Plaintiff may use the attached documents, any documents produced by Defendants and any documents that have yet to be produced by Defendants but that are forthcoming.

Dated: 4/5/2021

Respectfully submitted,



/s/ _____
Sandra Hanshaw Burink (P68619)
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Certificate of Service

I certify that I served Plaintiff's Responses to Defendants' First Discovery Requests to counsel for Defendants via electronic mail on April 5, 2021.

s/ 